

Dear Courtney,

My name is Maggie Zhou. I live in Arlington, MA. I would like to comment on the emergency regulations released by DOER on Dec31, which as I understand requires capture and sequestration of carbon-dioxide emissions from coal gasification, and limit CO2 emissions to **890 lbs/MWh** for all emissions from gasification and combustion of coal gas to produce electricity.

This figure, which is similar to modern natural gas power plant emission rates (which themselves are still rather inefficient, obtaining only about half of the energy contained in natural gas while releasing all of its carbon content), is only slightly better than burning coal without Carbon Capture and Storage (CCS), and allowing such plants to be built will only **push us in the opposite direction** if we want to reduce greenhouse gas (GHG) emissions to address climate change, as mandated by the Massachusetts Global Warming Solutions Act signed into law in 2008.

According to Dr. James Hansen, director of the NASA Goddard Institute for Space Studies and Adjunct Professor at the Columbia University Earth Institute, the only plausible scenario whereby we could return atmospheric GHGs to a level low enough within this century that could hopefully avoid powerful geophysical feedback loops such as ice sheet disintegration and methane release from frozen tundra from taking global warming completely out of human control, is **by phasing out ALL coal power plants in the world by 2030, except where carbon is COMPLETELY captured and SAFELY stored. His calculations therefore assumed that the vast coal reserves will be left underground and not emitted into the air, on top of other aggressive strategies of reforestation and land use changes to sequester carbon.** Now even if we require all new coal power plants to reduce their emission to the EQUIVALENT of natural gas plants, that still means that we are emitting most of the carbon from coal, thereby nullifying Hansen's projections, and losing the precious opportunity to act before the short time window (a few years) that could save our planet is permanently closed to us.

This loophole must be removed, so as to not allow ANY coal power plant to be built, unless it COMPLETELY captures all the carbon, and that the SAFETY OF PERMANENT CARBON STORAGE is beyond any shadow of doubt and endorsed by the wider scientific community.

Thank you.

Sincerely

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